

EXHIBIT B

TRANSCRIPT OF RECORDED STATEMENTS OF

MJM CASE NUMBER: TOK173661

APPEARANCES:

Gerard Trimboli, Investigator
MJM Investigations, Inc.
910 Paverstone Drive
Raleigh, North Carolina 27615
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Recorded statements of Barbara Warnock and Patricia Harris-Lee
taken on April 21, 2006, transcribed from audiotape by Jacquie Charns.

Volume 1 of 1

Pages 1 through 89, inclusive

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I N D E X

Personal Interviews

EXAMINATION OF: Barbara Warnock

By Investigator: Gerard Trimboli

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EXAMINATION OF: Patricia Harris-Lee

By Investigator: Gerard Trimboli

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April 21, 2006

4:45 P.M.

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4 The CLAIMANT herein, having given permission to voluntarily
5 participate in a recorded statement, responded to the
6 Investigator's questions with the following responses:

RECORDED STATEMENT BY INVESTIGATOR:

9 Q: My name is Gerard Trimboli. Today's date is April 21,
10 2006 and the time is 4:45 p.m. hours. I am interviewing
11 Patricia Harris-Lee regarding a claim filed with Tokia
12 Marine Nichido Fire Insurance Company. And their file
13 number is WCT000018709. Miss Lee are you aware that I'm
14 recording this conversation?

15 A: Yes.

16 Q: And do I have your permission to continue?

17 A: Yes

18 Q: All right. Can you please state your last -

19 A. Harris-Lee

²⁰ Q: Okay and your first name

21 A. Patricia

²² Q: All right. Patricia, when do you expect to

²³ A: 66 Lexington Avenue, Jr.

24 Q: And your telephone number?

25 At 201-360 1801

1 Q: And what is your date of birth, ma'am?

2 A: 10-14-67.

3 Q: Okay. Who are you currently employed by?

4 A: Sony BMG Music Entertainment.

5 Q: And how long have you been employed?

6 A: Since 1991, September, 1991.

7 Q: And what is your current position?

8 A: I am Associate Director of Advertising Management.

9 Q: And what is your work schedule?

10 A: Regular...5 days a week, 10 to 6. Sometimes overtime. I
11 stay 40 plus hours.

12 Q: So basically, Monday through Friday...

13 A: Yes.

14 Q: 10 to 6.

15 A: Yes.

16 Q: Okay. I want to direct your attention to March 30th of
17 this year. Um...a recollection of a meeting that took place?

18 A: Yes. It was a lunch that I had pretty much initiated
19 with my supervisor to, you know, just go over some things
20 that was happening during the morning and this required
21 that.

22 Q: And your supervisor is?

23 A: Barbara Wornock-Logan.

24 Q: Okay. When you set up the meeting...

25 A: It was a lunch.

1 Q: It was a lunch. Was she made aware of that there would
2 be business discussed, or was she...

3 A: We...

4 Q: ...under the impression that this was just a lunch?

5 A: ...We...she was aware that I wanted to talk to her
6 about...uh...Dennis Santorino's request of my help for the
7 immediate move, yes.

8 Q: And how long...when did you make her aware that you
9 wanted to sit down and have this meeting and this lunch?

10 A: Uh...I asked her was she feeling like having lunch
11 between the hours of 11:30 and 12, because...you know,
12 uh...because I was working helping out at that time so I
13 wanted to know if she could have lunch if she was up to it.

14 Q: And she agreed?

15 A: Yes, she agreed.

16 Q: Okay. And...

17 A: And I asked her to pick what she wanted to eat.

18 Q: And where did the meeting occur?

19 A: Because it was...her office is the biggest office in our
20 department, it was in her office.

21 Q: Okay. And the agenda of the meeting I understand was
22 just to discuss the future...

23 A: It was...

24 Q: ...of the department?

25 A: No, it was not. There is no set parameters. Um...before

1 the meeting I was speaking with Dennis Santorino outside
2 her office and when I sat down to talk to her, it wasn't a
3 scheduled type thing. She asked me what happened Dennis.
4 What he asked...what did he want me to do and I started
5 explaining to her. Right after I explained that to her I
6 knew that Rob Henzi, Escaban Richberg and Brendon had some
7 other questions but I knew...but I didn't know if they were
8 going to address them but Rob started to address them.

9 Q: Okay. And in that meeting, is Rob asking specific
10 questions?

11 A: Yes. Rob is asking...uh...since this...Rob is saying...he goes
12 right into since we're discussing media, you know, he
13 starts asking her what...why is media moving on this floor
14 and why has media been a part...and just everything...what's
15 happening with...that...he sees that they were changing other
16 departments and we're still...

17 Q: So basically, everybody's concerned about...

18 A: Everyone's...

19 Q: ...what their future is in the company.

20 A: Yes. Because...yes.

21 Q: Okay.

22 A: Because, you know, media is moving here. Barbara has
23 had prior conversations with each and every one of them
24 about media, so yes, they just...we wanted a consistent
25 statement.

1 Q: Okay, now, during that meeting okay...is there any point
2 where there might have been some type of outburst by
3 Barbara?

4 A: Yeah. Barbara got extremely angry at Rob's questioning
5 and she started to raise her voice and use profanity. She
6 stated that, you know, she had just had her baby checked
7 out was the exact term, and you know, she's emotional and
8 you know, she just...it...yeah. Basically, she didn't
9 understand why she was being questioned or why he
10 questioned her.

11 Q: How long did this meeting take place?

12 A: Um...after...I would say like about half hour...half hour,
13 forty minutes. Right after that, Escaban comes in and he
14 says I guess he could feel what was happening in the room.
15 He says he wants to be a part of the conversation.

16 Q: Now, did anyone else have any type of...or did Barbara
17 have any other...uh...anger?

18 A: She was...she was...she was showing signs of anger. She
19 didn't...she stopped yelling at him. Rob asked her to stop
20 yelling at him and cursing at him and she stopped. And I
21 asked her, I just said, you know, Barbara calm down. We're
22 just talking. We're just...we're just having a conversation.
23 You know, we just want to find out what's going on and she
24 calmed down and then Escaban had questions...he was the one
25 asking her questions about, you know, how can we help if

1 she's trying to get..you know, really get this position
2 with media then let's talk about, you know, putting
3 together a proposal.

4 Q: Did...

5 A: And then Brendon started with questions.

6 Q: Did you personally have any interaction with her as far
7 as negatively?

8 A: Not in the meeting. I had very little to say. I
9 was...yes, not in the meeting. I had very little to say. I
10 was pretty much listening.

11 Q: And how would you say the meeting ended? Apologies by
12 Barbara?

13 A: Barbara apologized to Rob and it ended. She had the
14 outburst and then it ended.

15 Q: Okay. Did any...did any discussions occur after the
16 meeting?

17 A: No, we all left her alone. We could see it bothered
18 her.

19 Q: And so everyone continued on their regular...

20 A: Yes.

21 Q: ...duties...

22 A: Yes.

23 Q: And no interaction with Barbara...

24 A: No.

25 Q: ...throughout the day?

1 A: No. We worked around her.

2 Q: Okay. I want to direct your attention to the next day,
3 which is March 31st of 2006. And you arrived to work at your
4 normal time?

5 A: Normal time.

6 Q: Okay. And did you...do you have any interaction with
7 Barbara initially?

8 A: I could feel that there was some, you know, there was
9 still tension so I didn't really interact with her until
10 like the end of the day. I was still trying to help Dennis
11 finish up the move that day and I touched base with her
12 around 5. Between 4:30 and 5.

13 Q: Okay. And when you say you touched base with her, what
14 was that?

15 A: This is the end of the day. It's Friday. I wanted to go
16 home. You know, it was a long week and that's pretty much
17 just to pack it up...

18 Q: Okay. Did you ask that you wanted to leave early that
19 day?

20 A: Yes. I told her I'm done. Things are...just gave her a
21 status and said I would like to leave at 5 if that's okay.
22 She said that was fine and then the subject of why I was
23 helping Dennis with the move and um...helping Chris collect
24 the art work from the offices came up. Which caught me by
25 surprise, because that's just...I thought that was obvious.

1 Q: Now.

2 A: Chris (last name unintelligible) being, you know, the
3 head of the Creative Services and Dennis Santorino...

4 Q: Now before you left, had you...before...did you go in once
5 to ask her...to tell her you'd like to leave?

6 A: I went in to ask her. She...yes. And that's when the
7 subject came up with Dennis. Then I mentioned to her, you
8 know, that technically what I was doing for Dennis was
9 after work hours and I'm on my own time. Um...and because I
10 didn't understand why she was...why she was taking an...you
11 know, issue with that. And I walked out after that and I
12 came back to say, okay, I'm leaving for the night and then
13 the situation came back to Dennis and then I asked her
14 was...is it really about Dennis. Is the conversa...Is this
15 really about Dennis, like her issues.

16 Q: Okay. And that...what do you think the issues were?

17 A: I think that Barbara was somehow still offended over
18 the questioning of the meeting yesterday and the fact that
19 she had...she was embarrassed by her outburst and a lot of
20 times...she is. I mean a lot of things that I've witnessed in
21 the past is embarrassing but, you know, and I think she...she
22 did realize that it was. Because we were all shocked by it
23 but I think she...she wanted to get at me for it. She felt
24 that I was responsible.

25 Q: Because you asked for the luncheon.

1 A: Because I asked for the lunch.

2 Q: Okay.

3 A: But I had asked her for lunch on Tuesday when she...and
4 she declined and I was not try...on Tuesday I was just asking
5 for her and myself so I didn't expect to see her on
6 Thursday. And I thought we could follow up on Thursday when
7 I asked again.

8 Q: Okay. So after you walked into the office and you have
9 the, you know, you're looking to leave now...

10 A: Um-hum.

11 Q: ...did the...did this discussion become somewhat heated?

12 A: It was...it's heated.

13 Q: Okay.

14 A: I uh...I you know, I felt like Barbara was being
15 hypocritical in her statements about me. And I used the
16 word hypocritical. And when I asked her what it really was
17 about, she says to me, well, as a matter of fact she felt
18 like I ambushed her in the meeting on Thursday. She used
19 the word ambushed. She felt that I ambushed her. And I
20 said, I knew it. Because the animosity and the
21 questioning...just...it just all made sense. That she was
22 blaming me for Thursday's meeting. And I just decided to
23 forward with Barbara and say that, you know, she's tak
24 it too personal. She didn't like the fact that I was
25 saying...that she was taking it personal. She got up to le

1 and then I followed her out the door at which time she
2 turned around and started attacking me verbally and she
3 rushed in my face up in front of me just dusting her
4 hands...both hands...just shaking and yelling saying on both
5 sides of my face with her hands and you know. Shocked,
6 frightened. I grabbed her hands not knowing where it was
7 going. I was back up against the wall. And I asked her to
8 stop. I asked her to calm down, you know, for a moment
9 there, she released you know, we broke and she...proceeded to
10 say just some real strange derogatory things to me. And
11 um...after a few minutes she got on the elevator and left and
12 then that was the end of that.

13 Q: Okay. I want to get a little bit more details on the
14 physical...

15 A: Um-hum.

16 Q: ...contact.

17 A: Um-hum.

18 Q: That was made. We can't see this on tape...

19 A: Yeah.

20 Q: ...as I mentioned to you I'm asking your actions and
21 what...what Miss Lee is doing. Is she putting up her hands
22 side by side in front of her face...

23 A: Um-hum. Um-hum.

24 Q: Almost like in a defensive posture.

25 A: Yes. Like that.

1 Q: Okay. Did she touch you at all or did she...

2 A: She...she didn't get a...she's close. She's shaking her
3 hands and she didn't get a chance to really hit me because
4 I'm restraining her. I don't know what her...I don't know how
5 far it's going. I don't know where her hands are going. I
6 just know they're uncomfortably in my face area.

7 Q: Okay.

8 A: She's shaking and she's yelling and I'm just holding
9 her saying with my face sort of turned and my back...leaning
10 way back saying, you know, against the wall saying...Barbara
11 stop. Barbara calm down. Um...you know, and I'm hearing...a lot
12 is going on. I mean there's just...she's...she's just...she
13 breaks away. You know. Puts her hands down and just you
14 know, yelling and saying things and she just goes off into
15 the elevator and you know, whatever. There's a sign...there's
16 a sign...I tell her okay, whatever. But don't worry about
17 nothing I'll take care of it...and...the department, and she's
18 on the elevator and I just collapse on the reception area.

19 Q: Okay. When she uh...what time does Barbara work until
20 that day?

21 A: It was...we were...uh...

22 Q: Both work until 6:00?

23 A: We both work until 6:00.

24 Q: Okay. You were...you were leaving earlier.

25 A: I was leaving earlier, yes.

1 Q: And after this conversation takes place between the
2 both of you and you have the disagreement...you're starting
3 to get to the bottom of why she may be angry at you is
4 because of the meeting the day...

5 A: Yeah.

6 Q: ...before.

7 A: Yeah.

8 Q: Okay, so it becomes somewhat of a heated discussion and
9 Barbara decides she wants...she's going to leave.

10 A: Because she...yeah, cause I...I was...I was being...I decided
11 at that moment that I would be honest with her about...I just
12 decided to...to...to say you know, this is not personal. The
13 meeting was not personal, you know. There's a lot that
14 these guys have on their minds. There's a lot that I have
15 on my minds. Things are going on. Dennis is looking at
16 offices. It's not about you. It's not personal and when I
17 said that, you know, it's...she reacted. It was just like,
18 you know, again...a...she reacted.

19 Q: So she got...she went to grab her coat and she said...

20 A: She got up...

21 Q: ...she was going to leave?

22 A: No. She just...she didn't say anything. She just...when I
23 said it's not personal she just got up. Angrily got up. And
24 she started to grab her coat, opened the door and I
25 walked...I'm walking behind her, you know.